

Exhibit 65

Transcript of the Testimony of
Sarah Saldana

Date:

June 29, 2018

Case:

STATE OF TEXAS vs UNITED STATES OF AMERICA

Sarah Saldana

June 29, 2018

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF TEXAS

STATE OF TEXAS, et al. :
Plaintiff :
 :
vs. : C.A. NO. 1:18-cv-00068
 :
UNITED STATES OF AMERICA, :
et al. :
Defendant :

ORAL DEPOSITION OF
SARAH R. SALDANA
JUNE 29, 2018
VOLUME 1 OF 1

ORAL DEPOSITION OF SARAH R. SALDANA,
produced as a witness at the instance of the Plaintiffs,
and duly sworn, was taken in the above-styled and
numbered cause on June 29, 2018, from 9:01 to
11:34 a.m., before Vonda P. Treat, CSR No. 2584, in and
for the State of Texas, reported by machine shorthand,
at the offices of the Texas Attorney General, 1412 Main
Street, Suite 810, Dallas, Texas, pursuant to the
Federal Rules of Civil Procedure and the provisions as
stated on the record or attached hereto.

Sarah Saldana

June 29, 2018

Page 2

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

DEPOSITION OF SARAH R. SALDANA

I N D E X

	PAGE
Appearances.....	3
Stipulations.....	4
Examination by Mr. Disher.....	4
Reporter's Certificate.....	98

EXHIBIT INDEX

1	Declaration of Sarah R. Saldana	7
2	U.S. Citizenship and Immigration Services Chart	81
3	DACA, Advance Parole, and Family Petitions	84

Sarah Saldana

June 29, 2018
Page 3

A P P E A R A N C E S

FOR THE PLAINTIFFS:

Mr. Todd Lawrence Disher
Attorney General's Office - Texas
Special Counsel for Civil Litigation
PO Box 12548
Austin, Texas 78711
512-936-2266 Fax 512-936-0545
todd.disher@oag.texas.gov

FOR THE DEFENDANT:

Mr. Aaron Goldsmith
U.S. Department of Justice
450 5th Street, NW
Washington, DC 20530-0001
202-532-4107 Fax 202-616-8962
aaron.goldsmith@usdoj.gov

FOR THE DEFENDANT INTERVENORS:

Ms. Celina Moreno
MALDEF
110 Broadway, Suite 300
San Antonio, Texas 78205
617-388-3551
cmoreno@maldef.org

FOR THE STATE OF NEW JERSEY DEFENDANT INTERVENOR:

Mr. Brian DeVito (Telephonically)
Attorney General's Office - New Jersey
124 Halsey Street, Floor 5
Newark, New Jersey 07101
973-877-1405 Fax 973-648-4887
brian.devito@law.njoag.gov

ALSO PRESENT:

Ms. Caitlin Lavery (Telephonically)

Sarah Saldana

June 29, 2018

Page 27

1 A. I can think of at least one instance. I can't
2 give you a quantity; but, yeah.

3 Q. It happens?

4 A. Yes.

5 Q. All right. As the director of ICE, it was
6 important, in your mind, for your agency and employees
7 to follow duly enacted laws.

8 A. Yes.

9 Q. Why was that important to you?

10 A. Because we're -- that's our whole purpose and
11 mission, is to enforce the immigration and customs laws
12 of the United States.

13 Q. If there was a law that you disagreed with
14 personally, would you still direct your agency and
15 employees to follow that law?

16 A. Yes.

17 Q. And you would still follow that law.

18 A. Yes.

19 Q. Of course. Okay.

20 All right. Just to clarify one thing: I
21 know you were the director of ICE, but you never worked
22 for customs and border patrol.

23 A. No.

24 Q. And you never worked for the United States
25 Citizenship and Immigration Service.

Sarah Saldana

June 29, 2018
Page 98

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF TEXAS

STATE OF TEXAS, et al. :
Plaintiff :
 :
vs. : C.A. NO. 1:18-cv-00068
 :
UNITED STATES OF AMERICA, :
et al. :
Defendant :

REPORTER'S CERTIFICATION
DEPOSITION OF SARAH R. SALDANA
JUNE 29, 2018
VOLUME 1 OF 1

I, Vonda P. Treat, Certified Shorthand Reporter
in and for the State of Texas, hereby certify to the
following:

That the witness, SARAH R. SALDANA, was duly
sworn by the officer and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

That examination and signature of the witness
to the deposition transcript was considered waived under
Federal Rule 30(e)(1) because no request for signature
was made at the time of the deposition;

That the original deposition was delivered to
Mr. Todd Lawrence Disher, Custodial Attorney;

That pursuant to information given to the
deposition officer at the time said testimony was
taken, the following includes counsel for all parties

Sarah Saldana

June 29, 2018

Page 99

1 of record:

2 FOR THE PLAINTIFFS: Mr. Todd Lawrence Disher;

3 FOR THE DEFENDANT: Mr. Aaron Goldsmith;

4 FOR THE DEFENDANT INTERVENORS: Ms. Celina Moreno;

5 FOR THE STATE OF NEW JERSEY DEFENDANT INTERVENOR:

6 Mr. Brian DeVito;

7 That a copy of this certificate was served on

8 all parties shown herein.

9 I further certify that I am neither counsel

10 for, related to, nor employed by any of the parties or

11 attorneys in the action in which this proceeding was

12 taken, and further that I am not financially or

13 otherwise interested in the outcome of the action.

14 Certified to by me on this ____ day of

15 _____ 2018.

Vonda P. Treat

16

17

18

19

20

21

22

23

24

25

Vonda P. Treat, CSR No. 2584
Expiration Date: 12-31-18
Firm Registration No. 631
Kim Tindall & Associates, LLC
16414 San Pedro, Suite 900
San Antonio, Texas 78232
Phone 210-697-3400
Fax 210-697-3408